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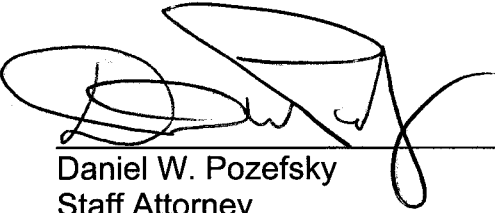
IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
SECTION 252(e) OF THE
TELECOMMUNICATIONS ACT OF 1996.

Docket No. RT-00000F-02-0271

RUCO'S NOTICE OF FILING

The Residential Utility Consumer Office ("RUCO") respectfully provides notice of filing the Minnesota's Public Utilities Commission's Order Adopting ALJ's Report and Establishing Comment Period Regarding Remedies, a copy of which is attached hereto.


RESPECTFULLY SUBMITTED this 14th day of November, 2002.


Daniel W. Pozefsky
Staff Attorney

Arizona Corporation Commission

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1 AN ORIGINAL AND TEN COPIES
2 of the foregoing filed this 14th day
3 of November, 2002 with:

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6 Phoenix, Arizona 85007

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6 mailed this 14th day of November, 2002 to:

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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair
Commissioner
Commissioner
Commissioner

In the Matter of the Complaint of the
Minnesota Department of Commerce Against
Qwest Corporation Regarding Unfiled
Agreements

ISSUE DATE: November 1, 2002

DOCKET NO. P-421/C-02-197

ORDER ADOPTING ALJ'S REPORT AND
ESTABLISHING COMMENT PERIOD
REGARDING REMEDIES

PROCEDURAL HISTORY

On February 14, 2002, the Commission received a complaint against Qwest filed by the Minnesota Department of Commerce (the Department) pursuant to Minn. Stat. § 237.462. The complaint alleged that Qwest, in neglecting to make public and seek Commission approval for eleven interconnection agreements with various competitive local exchange companies (CLECs), has acted in a discriminatory and anti-competitive manner.

On March 12, 2002, the Commission issued a NOTICE AND ORDER FOR HEARING referring the matter to the Office of Administrative Hearings (OAH) for a contested case proceeding. The Commission determined that the issues to be addressed by an Administrative Law Judge (ALJ) were as follows:

- 1) whether the agreements, or any portion thereof, needed to be filed with the Commission for review;
- 2) whether they were filed under other settings;
- 3) whether there were any exculpatory reasons why they were not filed; and
- 4) whether disciplinary action/penalties are appropriate.

Administrative Law Judge (ALJ) Allan W. Klein was assigned to the case.

On April 29, 2002, hearings regarding the eleven agreements commenced and were completed on May 2, 2002.

On May 24, 2002, the Department petitioned the ALJ to reopen the record to admit evidence regarding an alleged, newly discovered, oral, twelfth agreement. The ALJ granted the Department's request.

On August 6, 2002, the ALJ heard arguments regarding the twelfth agreement.

On September 20, 2002, the ALJ submitted his *Findings of Fact, Conclusions, Recommendation and Memorandum* (ALJ Report) to the Commission.

On September 30, 2002, Qwest filed exceptions to the ALJ Report.

On October 4, 2002, the Federal Communications Commission (FCC) issued its Memorandum Opinion and Order in *Qwest Communications International Inc. Petition for Declaratory Ruling on the Scope and Duty to File and Obtain Prior Approval of Negotiated Contractual Arrangements Under Section 252(a)(1)* (WC Docket No. 02-89, October 4, 2002). The FCC stated in ¶ 8:

[W]e find that an agreement that creates an *ongoing* obligation pertaining to resale, number portability, dialing parity, access to rights-of-way, reciprocal compensation, interconnection, unbundled network elements, or collocation is an interconnection agreement that must be filed pursuant to section 252(a)(1). [emphasis in original].

On October 8, 2002, Commission staff requested comments from parties regarding the impact of the FCC's Memorandum Opinion and Order on the current proceeding.

On October 10, 2002, replies to Qwest's exceptions were filed by AT&T.

On October 11, 2002, replies to Qwest's exceptions were filed by the Department.

On October 16, 2002, the following parties filed comments regarding the impact of the FCC's October 4, 2002 Memorandum Opinion and Order on the current proceeding: Qwest, the Department, and AT&T.

The Commission met to consider this matter on October 21, 2002.

FINDINGS AND CONCLUSIONS

I. SUMMARY OF COMMISSION ACTION

In this Order the Commission adopts the ALJ's report in its entirety, including the ALJ's findings that Qwest knowingly and intentionally violated federal law for each of 26 interconnection terms or groupings of terms.

The Commission also finds, based on the same findings of fact, that Qwest knowingly and intentionally violated Minn. Stat. § 237.09, Minn. Stat. § 237.121, subd. 5, and Minn. Stat. § 237.60, subd. 3.

Finally, the Commission adopts the ALJ's recommendation that the Commission take action against Qwest for its activities detailed in the ALJ's report.¹ To prepare to decide what form that action should take, the Commission will schedule input from the parties regarding what the precise remedies (monetary and/or non-monetary) should be in this matter.

II. ALJ'S REPORT

The ALJ concluded that :

- The Department has demonstrated by a preponderance of the evidence that Qwest has violated the provisions of 47 U.S.C. § 251, as more particularly set out in the Findings of Fact.
- The Department has demonstrated by a preponderance of the evidence that Qwest has violated the provisions of 47 U.S.C. § 252, as more particularly set out in the Findings of Fact.
- The Department has demonstrated by a preponderance of the evidence that each of Qwest's violations of 47 U.S.C. § 251 were knowing and intentional.
- The Department has demonstrated by a preponderance of the evidence that each of Qwest's violations of 47 U.S.C. § 252 were knowing and intentional.
- The Department has demonstrated by a preponderance of the evidence that a penalty is justified under Minn. Stat. § 237.462, subdivisions 2 and 3. The Commission is not limited, however, to a monetary penalty. Subdivision 9 of that statute explicitly allows the Commission to use other enforcement provisions available to it for these same violations.

Based on these conclusions, the ALJ recommended that the Commission take action against Qwest for its activities detailed in his Report.

III. QWEST'S EXCEPTIONS TO THE ALJ'S REPORT

Qwest objected to the ALJ's Report, arguing the following.

- The ALJ Report is fundamentally flawed because it applies a nonexistent standard and ignores the weight of the evidence in recommending that the Commission impose penalties against Qwest.
- The standard proposed, defining which terms must be filed for approval, is so broad and indefinite that it is impossible to apply.
- There is no evidence in the record that Qwest knowingly and intentionally did not file agreements under § 252.

¹ ALJ Report, page 54.

- The record is replete with unrebutted evidence of non-discrimination, which the ALJ Report improperly disregards.
- The ALJ Report erred in finding that penalties should be assessed. There is no evidence in the record that Qwest saved anything by not filing; that CLECs sustained any harm; that there are any past violations; that Qwest did not take corrective action; that Qwest structured the agreements to avoid disclosure; or that Qwest's revenues, assets, and ability to pay support penalties.

IV. COMMISSION ANALYSIS OF THE ALJ'S REPORT

A. Knowing and Intentional Failure to File Interconnection Agreements

The ALJ analyzed eleven written agreements between Qwest and various CLECs that Qwest had not filed with the Commission for approval before the Department brought its complaint and one oral agreement between Qwest and McLeodUSA that Qwest has never reduced to writing and submitted to the Commission for approval.

Contrary to Qwest's assertion in this matter, the type of agreements that are required to be filed under 47 U.S.C. §§ 251(a) and (e) was clear at the time Qwest chose not to file these agreements, based on the plain language of the federal law. Qwest's argument that its employees did not file these agreements because they were confused or had a good faith different view regarding the meaning of the law and their responsibilities under the law is not supported in the record and, in light of the plain language of the law, is not credible.²

Accordingly, the Commission agrees with the ALJ that Qwest knowingly and intentionally violated 47 U.S.C. §§ 252(a) and (e) because Qwest knew that the referenced statutes required the Company to file these agreements with the Commission and the Company intentionally did not make the required filing.³

² As the ALJ found, a common understanding of what must be filed (interconnection agreements) and what constitutes an interconnection agreement is shared by the Department, AT&T, the Residential and Small Business Utilities Division of the Office of the Attorney General (RUD-OAG), the Iowa Utilities Board and even reflected in Qwest's own SGAT (Section 4). ALJ Report, Finding of Fact #28. The validity and accessibility of this understanding is further confirmed by the FCC's October 4, 2002 Memorandum Opinion and Order in which the FCC articulated a filing standard virtually identical to the standard stated by the ALJ, stating that its articulated standard "flows directly from the statute." Memorandum Opinion and Order, Paragraph 10.

³ See ALJ's Report, Finding Nos. 45, 58, 65, 75, 86, 103, 114, 138, 148, 165, 184, 196, 205, 213, 221, 229, 240, 248, 256, 264, 281, 290, 302, 311, 342, and 353.

B. Discrimination

47 U.S.C. § 251 (b) (1) prohibits local exchange companies (LECs) such as Qwest from imposing unreasonable or discriminatory conditions on resale, and § 251 (c) (2) (D) requires LECs to provide interconnection on rates, terms and conditions that are nondiscriminatory. Section 251 (c) (3) requires incumbent LECs to provide access to network elements on an unbundled basis on rates, terms, and conditions that are nondiscriminatory.

In each of the twelve interconnection agreements cited by the Department, Qwest provided terms, conditions, or rates to certain CLECs that were better than the terms, rates and conditions that it made available to the other CLECs and, in fact, it kept those better terms, conditions, and rates a secret from the other CLECs. In so doing, Qwest unquestionably treated those select CLECs better than the other CLECs. In short, Qwest discriminated against the other CLECs in violation of Section 251.

Furthermore, there is no question that Qwest knew that it was extending special terms to the select CLECs and that it was keeping these terms secret from CLECs in general. Accordingly, the Commission agrees with the ALJ that Qwest's discrimination in violation of 47 U.S.C. § 251 was knowing and intentional.⁴

Qwest argued that before a violation of discrimination under 47 U.S.C. § 251 can be found, the Commission must find that the secretly offered term, rate or condition was something that particular CLECs desired and qualified for and that the unavailability of that term, rate, and condition injured particular CLECs. Qwest's argument is a diversion. Clearly, Section 251 is not simply a remedial provision for individual CLECs, but an important regulatory tool to assure a level playing field between competing local service providers. The extent of monetary harm caused to particular CLECs is a relevant factor to be shown and considered in determining monetary penalties and non-monetary remedies in a subsequent phase of this proceeding.⁵ But as a foundation for simply finding violation of the anti-discrimination provisions of Section 251, the particularized findings of monetary harm that Qwest would require are unnecessary.

In short, with respect to violation of the anti-discrimination provisions of Section 251, the question is simply: did Qwest offer preferential interconnection-related treatment to some CLECs? The Commission finds that Qwest did, and this is discrimination under Section 251. And with respect to "knowing and intentional," the question is: did Qwest know that it was offering preferential treatment to some CLECs and intend to give that preferential treatment? The Commission finds that it did know it was offering preferential treatment and intended to offer preferential treatment, which makes its action knowing and intentional. Accordingly, the Commission agrees with the ALJ's findings that Qwest knowingly and intentionally violated 47 U.S.C. § 251.

⁴ See ALJ's Report, Finding Nos. 46, 59, 67, 77, 88, 105, 117, 140, 150, 167, 187, 198, 207, 215, 223, 231, 242, 250, 258, 266, 282, 291, 304, 313, 344, and 354.

⁵ Harm to customers or competitors is specifically listed by Minn. Stat. § 237.462 as a factor to consider in determining the amount of penalty to be imposed, not whether a penalty should be imposed.

V. VIOLATION OF STATE STATUTES

The record compiled by the ALJ also supports finding that Qwest has violated state laws in at least three respects.

Minn. Stat. § 237.09 and § 237.60, subd. 3 prohibit discrimination in the provision of intrastate service. As discussed above, Qwest has provided preferential treatment to some CLECs and has done so knowingly and intentionally, in violation of federal law. The discriminatory actions cited, therefore, also knowingly and intentionally violate the above-cited Minnesota statutes because the discriminatory activity is the same and the local service affected is clearly intrastate service.

Minn. Stat. § 237.121, subd. 5 prohibits a telephone company from imposing "unreasonable or discriminatory restrictions on the resale of its services." It is an unreasonable restriction on resale to withhold favorable terms offered to competitors.

The Commission notes that these findings of knowing and intentional violations of these state statutes trigger possible imposition of administrative monetary penalties under Minn. Stat. § 237.462 and non-monetary remedies pursuant to Minn. Stat. § 237.462, subd. 9.

VI. REMEDIES PHASE OF THE PROCEEDING

Based on the findings and conclusions of the ALJ's Report and the findings and conclusions herein, the Commission will proceed to consider what remedies appropriately address the situation.⁶ The Remedies Phase will include consideration of 1) penalties for violation of state and federal law pursuant to Minn. Stat. § 237.462 and 2) non-monetary corrective measures which derive from other Commission authority or 3) those which the Commission must refer to the Attorney General or other appropriate authorities for pursuit.

The Commission will invite remedies proposals from all parties and provide each party opportunity to comment upon each others' proposals.

Parties should analyze their proposals and evaluate the proposals of others with reference to the factors set forth in Minn. Stat. § 237.462, subd. 2(b) and Minn. Stat. § 237.462, subd. 9. Among the issues that parties may wish to address in the course of their comments are the following:

1. Quantification of monetary harm done to specific CLECs by the activity found in the ALJ's Report (and confirmed in this Order) to have taken place.

⁶ This Order adopts the ALJ's Report in its entirety. In the Remedies Phase which follows this Order, therefore, no part of the ALJ's Report will be subject to revisiting and no issue addressed in that Report will be subject to relitigation or reargument. The Report's findings and conclusions may be utilized as bricks to help construct any argument for or against any remedies proposal.

2. Quantification of monetary benefit accruing to the benefitted CLECs and Qwest by this activity.
3. A rationale, including the mathematical calculation (number of violation days times a dollar amount for each violation day), for any monetary penalty proposed.
4. Public interest analysis (pluses and minuses) of various non-monetary remedies, including structural separation and revocation of Qwest's certificate of authority.
5. Whether any information in this docket is properly classified as trade secret or whether the entire record in this matter should be available to the public.
6. Proposed treatment of the interconnection agreements that have been subject to this proceeding that have not been terminated.

Parties' comments will be provided by briefs and supporting affidavits pursuant to the following schedule, which Qwest proposed and to which other parties agreed:

November 8 parties submit opening briefs and supporting affidavits

November 15 parties submit reply briefs and supporting affidavits

VII. ROLE OF THE BENEFITTED CLECS

This docket has focused, properly, on Qwest, the central player in the undisclosed interconnection agreements episode. As the incumbent local exchange company (ILEC) in this matter, Qwest holds a unique economic position and certainly bears direct and obvious responsibility under the cited federal and state statutes. The Commission is also concerned, however, about the role of certain CLECs that have participated in and benefitted from the illegal Qwest activity documented in this record. The Commission welcomes the Department's expressed commitment to examine the role of these CLECs and bring these matters forward for Commission consideration in due course and as warranted.

ORDER

1. The Commission adopts the Administrative Law Judge's Report in its entirety, including its findings that Qwest has knowingly and intentionally violated federal laws regarding the interconnection agreement provisions cited therein. A copy of the ALJ's Report is incorporated by reference.
2. The Commission finds that Qwest has also knowingly and intentionally violated state laws as enumerated above at page 6 of this Order.
3. The Commission initiates the Remedies Phase of this proceeding by establishing a comment period, as discussed above at pages 6 and 7 of this Order.
4. The schedule for the Remedies Phase is as follows:

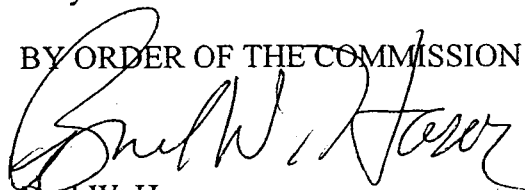
November 8 parties shall submit opening briefs and supporting affidavits

November 15 parties shall submit reply briefs and supporting affidavits

November 19 Commission hearing

5. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

A handwritten signature in black ink, appearing to read "Burl W. Haar", is written over the typed name.

Burl W. Haar
Executive Secretary

(SEAL)

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